REMARKS/ARGUMENTS:

Entry of the above amendments, and reconsideration of the claim rejections, as they might apply to the original and amended claims in view of these remarks, is respectfully requested. Please cancel claim 4 without prejudice or disclaimer of the subject matter contained therein. Claims 2 and 14 have been previously cancelled. Claims 1, 3, 5-13, and 15-19 remain in the application. In this Response, claims 1, 3, 5-13, and 15-19 have been amended.

The amendments submitted above to certain claims have been done so either in response to the Examiner's rejections or objections or to correct antecedent basis, to correct inconsistent claim element names, or to correct punctuation, spelling, improper word usage, and the like.

No new matter has been introduced through any of these claim amendments.

A. Interview Summary

Applicant would like to thank Examiner Solomon and his SPE for the telephone interview that was held on January 29, 2008. A summary of the meeting is as follows:

Amended independent claims 1 and 9, which stand rejected under 35 U.S.C. §102(e) as being anticipated by Bushe et al., U.S. Patent No. 6,978,422, were discussed. Applicant was confused by Examiner Solomon's Response to Arguments section of the office action mailed on 10/17/07. It was explained to Applicant that the essence of the Response to Arguments section is that the claim amendments are moot in light of the arguments presented in the Detailed Action section. Applicant pointed out that amended claims 1 and 9 have additional steps and additional structures or elements not taught by Bushe et al., and that there is a second source for applying user interface elements to an object that has been bound to a visual style that is not taught by Bushe et al. Examiner Solomon pointed out that in his opinion the claim language was not specific enough to capture these distinctions. Applicant agreed to amend the claims further to more clearly define these distinguishing elements.

Applicant does not believe that the amendments made to the claims will require a new search, as all of the claim elements in the amended claims have appeared either in the original claims, or in the claims as amended by Applicant in response to the first office action in this

RCE. Examiner Solomon has cited what he has determined to be the most relevant prior art in the first office action.

B. Objection to Claims
Informalities

Item 3 In The Office Action

The Examiner objected to claims 3-8, 10-13, and 15-19 because of the following informality: these claims are dependent claims and they should begin with the word "The" as referred to the patent claim. In response to the objection, Applicant has amended claims 3-8, 10-13, and 15-19 to correct the informality so that these claims begin with the word "The" and believes that amended claims 3-8, 10-13, and 15-19 are now in acceptable form.

C. Rejection of Claims
Under 35 U.S.C. § 102(e)

Items 4 and 5 In The Office Action

The Examiner has rejected claims 1, 3-6, 8-13, and 15-18 under 35 U.S.C. §102(e) as being anticipated by Bushe et al., U.S. Patent No. 6,978,422.

In response, Applicant has amended independent claims 1 and 9 to more distinctly distinguish Applicant's invention through the further limitations of:

(Claim 1)

"a tree assembler module for generating a visual tree which is an internal representation of a combination of the one or more data fields and ~~based on~~ the ~~appropriate~~associated visual style definition;

a user interface element factory having additional user interface elements;

a layout engine for adding one or more of the additional user interface elements to the visual tree after the ~~appropriate~~associated visual style definition has been bound to the one or more data fields, wherein the layout engine is able to place said additional user interface elements relative to the physical properties of a display of the computer system; and

a rendering engine which uses the visual tree passed to the layout engine which added the one or more user interface elements to render the data for display"

(Claim 9)

"generating a visual tree which is an internal representation of a combination of ~~using~~ the one or more data items and the ~~appropriate~~associated visual style;

binding properties of the associated visual style in the visual tree to properties of the one or more data items;

adding additional user interface elements to the visual tree after the properties of the associated visual style in the visual tree have been bound to the one or more data items, wherein the additional user interface elements are placed relative to the physical properties of a display; and

rendering the one or more data items for display based on the visual tree having the additional user interface elements"

Support for these amendments may be found in the specification on page 10, lines 12-17, page 11, lines 26-32, and page 12, lines 24-29 all in reference to FIG. 3; and page 15, lines 27-31 in reference to FIGS. 3 and 5.

Applicant's amended claim 1 has:

"a style definition module for holding one or more visual style definitions"

and as ***separate*** and ***distinct*** elements:

"a user interface element factory having additional user interface elements;"

"a layout engine for adding one or more of the additional user interface elements to the visual tree after the associated visual style definition has been bound to the one or more data fields, wherein the layout engine is able to place said additional user interface elements relative to the physical properties of a display of the computer system" and

"a rendering engine which uses the visual tree passed to the layout engine which added the one or more user interface elements to render the data for display."

The Examiner asserts that these separate and distinct claim elements are taught by Bushe et al. at col. 9, lines 13-24: "as additional ***managed resources*** become available for management by a resource management application." However, a close examination of this portion of Bushe et al. does not support the assertion. Reading further in the same paragraph, Bushe et al. states that "the ***data dictionary*** can be updated with new managed object definitions that represent such ***managed resources***." Bushe et al. has only one structure or element (Data Dictionary **123**) for storing information on managed resources for displaying on a Display **127**. That information includes View Definitions **132**, Object Definitions **133**, and Object Data **134** (*see* **FIG. 1** in Bushe et al.). In order for Bushe et al. to be able to display any information about a managed resource, that information has to be first added to Data Dictionary **123**: "the process **121** operates to obtain and access the data dictionary **123** to display a master view **128** in the graphical user interface **129** on the display **127.** The master view **128** includes one or more user selectable tasks **116** and one or more user selectable managed objects **117**." (col. 10, lines 50-54). Bushe et al. does not have separate structures or elements where, after a **visual style has been bound** to one or more data fields from a style definition module **310**, that ***additional*** user interface elements in a ***separate structure*** (user interface element factory **324**, **FIG. 3** in the specification) are added by a layout engine **322** and then rendered by a rendering engine **320**. The layout engine **322** "understands the physical properties of the display such that it can determine where to place certain display items and how large to make them relative to the physical characteristics of a particular computer system." (*See* page 12, lines 26-29 in the specification) All of these structures or elements and functions **are claimed** in amended claim 1. Bushe et al. is limited in that before a managed resource can be displayed, parameters must be first added to Data Dictionary **123** (View Definitions **132**, Object Definitions **133**, and Object Data **134**.[1] Then, when a call is made to display information on the managed resource, the Data Dictionary **123**, and ***only*** the Data Dictionary **123**, is called to apply the "style" for rendering on Display **127**. A close comparison of Applicant's **FIG. 3** and **FIG. 1** from Bushe et al. make

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[1] *See* col. 5, lines 6-15 and **FIG. 1** in Bushe et al. "Accordingly, as new resources are introduced into a computing system environment in which a resource management application operates, the resource management application can incorporate any **additional or newly defined views which are to be applied** when a user selects specific tasks to apply to specific resources for which the new view is appropriate to display resource data that results of the application of the task to the selected resources."

these differences in structure and function quite clear. Additionally the process flow of Bushe et al. as shown in FIG. 2 reveals that Bushe et al. does not have the additional elements or steps **as claimed in amended claims 1 and 9** of a layout engine adding, from a user interface element factory, additional user interface elements to the visual tree after the visual style definition has been bound to the data fields, and then rendering the modified visual tree. As claimed by Applicant in amended claim 1, when a call is made to render an object, visual styles are bound to the data, and a visual tree is constructed. After the visual tree is constructed, a rendering can be made directly. But in addition, the visual tree may be passed first to a layout engine **322** that adds more information to the visual tree, using user interface elements from user interface element factory **324** to complete the tree. (*See* page 12, lines 21-29 in the specification). It is not possible for Bushe et al. to perform this function as Bushe et al. has no structure or methods to do so.

Bushe et al. does not teach or disclose a separate user interface element factory **324** (page 12, lines 24-29 in the specification), which is in addition to the style definitions module **310** (page 10, lines 12-20 in the specification) disclosed by Applicant. Bushe et al. only teaches one source for View Definitions **132**, Object Definitions **133**, and Object Data **134**, all contained in data dictionary **123**. The separate user interface element factory **324** allows additional user interface elements to be applied to the data ***after the stored style definitions have already been applied***. These additional user interface elements are applied through a ***separate layout engine 322*** (page 12, lines 24-29 in the specification) which is different and distinct from the rendering engine **320** (page 12, lines 21-24 in the specification). Bushe et al. does not teach or suggest this added functionality, which essentially is a ***post processing operation performed after style definitions have been applied***, and can be used to "determine where to place certain display items and how large to make them relative to the physical characteristics of a particular computer system" (*see* page 12, lines 27-29 in the specification).

Applicant submits therefore that Bushe et al. does not teach nor suggest these additional limitations. Since the Bushe et al. reference does not disclose expressly or inherently ***all*** of the elements and limitations of Applicant's amended claim 1, Applicant believes that claim 1 is not anticipated by Bushe et al., and Applicant requests withdrawal of the Examiner's rejection to this claim under 35 U.S.C. §102(e).

Claims 3-6 and 8 depend directly or indirectly from independent claim 1 and include all the elements and limitations thereof. As a result, and in light of the foregoing remarks concerning independent claim 1, Applicant likewise believes that claims 3-6 and 8 also overcome the Examiner's rejection based on Bushe et al. under 35 U.S.C. §102(e), and withdrawal of that rejection in respect to these claims is also respectfully requested.

Regarding independent claim 9, the above arguments are equally applicable as the claim amendments are nearly identical to those made to claim 1. Applicant submits therefore that Bushe et al. does not teach nor suggest these additional limitations. Since the Bushe et al. reference does not disclose expressly or inherently ***all*** of the elements and limitations of Applicant's amended claim 9, Applicant believes that claim 9 is not anticipated by Bushe et al., and Applicant requests withdrawal of the Examiner's rejection to this claim under 35 U.S.C. §102(e).

Claims 13 and 15-18 depend directly or indirectly from independent claim 9 and include all the elements and limitations thereof. As a result, and in light of the foregoing remarks concerning independent claim 9, Applicant likewise believes that claims 13 and 15-18 also overcome the Examiner's rejection based on Bushe et al. under 35 U.S.C. §102(e), and withdrawal of that rejection in respect to these claims is also respectfully requested.

D. Rejection of Claims Under 35 U.S.C. § 103(a)

Items 6 and 7 In The Office Action

The Examiner has rejected claims 7 and 17 under 35 U.S.C. §103(a) as being unpatentable over Bushe et al. in view of Hanggie et al., U.S. Patent Publication No. 2003/0231204 A1.

Applicant respectfully traverses. Claim 7, through dependency, embodies all of the elements and limitations of independent claim 1, and claim 17, through dependency, embodies all of the elements and limitations of independent claim 9. Applicant has amended independent claims 1 and 9 as described above in Section C to remove Bushe et al. as anticipatory prior art under 35 U.S.C. §102(e). As argued above, Applicant believes that Bushe et al. does not teach or suggest all the elements and limitations of Applicant's independent claims 1 and 9. Therefore,

even if Hanggie et al. teaches the additional specific claim elements as stated by the Examiner (a plurality of objects displayed as a combo box), combining Hanggie et al. with the teaching of Bushe et al. would not arrive at Applicant's claimed invention. Thus, Applicant believes that dependent claims 7 and 17 are patentable over Bushe et al. in view of Hanggie et al. Accordingly, Applicant requests retraction of the Examiner's rejection of claims 7 and 17 under 35 U.S.C. §103(a).

Items 8 In The Office Action

The Examiner has rejected claim 19 under 35 U.S.C. §103(a) as being unpatentable over Bushe et al. in view of Lynch et al., U.S. Patent No. 6,558,431.

Applicant respectfully traverses. Claim 19, through dependency, embodies all of the elements and limitations of independent claim 9, Applicant has amended independent claim 9 as described above in Section C to remove Bushe et al. as anticipatory prior art under 35 U.S.C. §102(e). As argued above, Applicant believes that Bushe et al. does not teach or suggest all the elements and limitations of Applicant's independent claim 9. Therefore, even if Lynch et al. teaches the additional specific claim elements as stated by the Examiner (detecting dynamic changes in data, invalidating the visual tree, regenerating the visual tree, and re-rendering the display), combining Lynch et al. with the teaching of Bushe et al. would not arrive at Applicant's claimed invention. Thus, Applicant believes that dependent claim 19 is patentable over Bushe et al. in view of Lynch et al. Accordingly, Applicant requests retraction of the Examiner's rejection of claim 19 under 35 U.S.C. §103(a).

CONCLUSION:

This Amendment fully responds to the Office Action mailed on October 17, 2007. Still, that Office Action may contain arguments and rejections that are not directly addressed by this Amendment due to the fact that they are rendered moot in light of the preceding arguments in favor of patentability. Hence, failure of this Amendment to directly address an argument raised in the Office Action should not be taken as an indication that the Applicant believes the argument has merit. Furthermore, the claims of the present application may include other elements, not discussed in this Amendment, which are not shown, taught, or otherwise suggested by the art of record. Accordingly, the preceding arguments in favor of patentability are advanced without prejudice to other bases of patentability.

Thus, a bona-fide attempt has been made to ensure that the application meets all statutory requirements and is in condition for allowance. The Examiner's early indication to that effect is, therefore, courteously solicited.

If a telephone conference would expedite allowance or resolve any additional questions, such a call is invited at the Examiner's convenience.

Applicant has authorized a charge against deposit account 13-2725 for the extension fee due with this response, or any future reply. Please charge all required fees, or fees under 37 C.F.R. 1.17, if any are due with this response, or credit any overpayment to, deposit account 13-2725.

Respectfully submitted,

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